



Weston Solution, Inc. 14724 Ventura Blvd. Suite 1000 Sherman Oaks, CA 91403 (818) 464-7050

SFUND RECORDS CTR
2380777

From: Ben Castellana, Project Manager, Weston Solutions, Inc.

To: Matt Mitguard, United States Environmental Protection Agency

RE: Response to QAO Comments to Draft Tujunga Discovery SAP

Date: October 20, 2008

Dear Matt Mitguard,

On October 1, 2008 Weston Solutions, Inc. (WESTON) submitted the Draft Version 1 Tujunga Wellfield Site Discovery Sampling and Analysis Plan to the United States Environmental Protection Agency (EPA) for review. WESTON received verbal comments from EPA on October 9, 2008, and written comments from EPA Quality Assurance Office on October 15, 2008.

WESTON has addressed the written comments, as follow below. WESTON has also addressed verbal comments. Please find the complete Version 2 Tujunga Wellfield Site Discovery Sampling and Analysis Plan in electronic version on the WESTON Team Link site.

In a conference call on October 20, 2008, Carl Brickner (EPA QAO) indicated that the hexavalent chromium laboratory reporting limits and SOPs should be described as DTSC indicated (3 ppb by EPA Method 7199; the lab will use the EPA Method as the SOP). In addition, the plan has been revised to indicate that the hexavalent chromium data will be used qualitatively and not for HRS purposes. Language to this effect has been added to Section 3.5.2 as well as Section 5.0.

Written comments (regular type) and responses (**bold type**):

1. [General] Standard operating procedures (SOPs) for the subcontract mobile laboratory were not provided for review. It was explained to the reviewer during the October 9, 2008 conference call that due to the nature of the procurement process through the US Army Corps of Engineers interagency agreement, a mobile laboratory has not been selected for the project at this time. According to the Weston Solutions, Inc. representative, mobile laboratory procurement can only occur after the SAP has been approved by EPA. Therefore, they are unable to provide any supporting documentation, e.g., SOPs, for QA Office review. It was recommended that a brief explanation be added to the plan acknowledging this issue and stating that once a mobile laboratory has been procured SOPs and other supporting documentation will be stored in the project files, for future reference, if necessary.

It was stated during the conference call that relevant sections of the approved SAP will be shared with prospective bidders by Weston Solutions, Inc. so that they are informed of the project specific data quality indicators and analytical requirements prior to submitting bids.

Response:

Section 3.5.3 has been modified to read, "Published reporting limits are presented in Table 3 for soil gas analyses because the laboratory has not been contracted as of the date of production for this SAP. The actual contract laboratory values will meet, or be lower than, these values. Upon contracting a mobile laboratory, the SOPs and reporting criteria will be maintained in the Weston project record, available for EPA review."

Section 5, Bullet 4 has been revised to read, "The laboratory has not yet been contracted; however, the reporting requirements will meet or exceed those outlined in the SOPs."

1 [General] Based on the October 9, 2008 conference call, the reviewer understands that soil gas data is intended to be used qualitatively. The plan does not clearly describe this qualitative use of the soil gas data. The plan should be revised to capture how the qualitative use of the soil gas data will assist in meeting project goals.

Response:

The SAP has been revised in several locations to indicate that the soil vapor data will be used qualitatively (Section 1.0 Bullet 2; Section 3.2, Bullet 2; Section 4.1.1.2, Paragraph 4; Section 5.0, Paragraph 4). The SAP has also been revised in several locations to indicate that the level of data for the soil vapor analyses will be screening level (Section 1.0, Paragraph 3; Section 1.0, Bullet 1; Section 1.3, Paragraph 4; Section 1.3, Bullets 1 and 3; Section 3.4, Bullet 1; Section 3.5.2, Paragraph 1; Section 4.1.2, Paragraph 1; Section 4.2, Paragraph 1; Section 5.0, Bullet 4; Appendix A Data Quality Objectives Worksheet).

2 [General] The pilot study which will be conducted in the vicinity of the Holchem/Price Pfister Cluster was not accurately described in the SAP. Based on the October 9, 2008 conference call, the description needs to be revised to more accurately reflect the scope of the study and the intended use of the resulting data.

Response:

Section 3.2, Bullet 2, has been revised to read, "The Holchem/Price Pfister portion of the Verdugo Fault Zone Transect may be used to calibrate the soil gas response. The soil gas data for this area with known contamination may be useful for qualitatively determining the magnitude of groundwater contamination in other areas of the transect. This test area is identified in Figure 2."

Section 4.1.1.2, Paragraph 4, has been revised to read, "The portion of the San Fernando Road/Verdugo Fault Transect that passes through the Holchem/Price Pfister Cluster VOC plume will be used as a test area to qualitatively determine the soil gas concentrations to be expected in an area known to have shallow groundwater contamination. If VOCs are detected in soil gas above the plume area, then soil gas may be a good analog for groundwater VOCs in the Study Area, and the soil gas concentrations may provide an indicator as to the level of shallow groundwater contamination present in other parts of the Study Area. Based on the results of the calibration study, the SAM may chose to modify the sample array to accommodate other data goals."

3 [General] The SAP is not clear on why metals data are going to be collected, nor is it clear on how the data will be used in meeting project goals. The SAP should be revised.

Response:

The sentence, "Soil samples will be collected from the shallow soils at each of these locations for metals analysis to determine whether metals, especially chromium, are elevated with respect to background." has been added to Section 1.3, Bullet 1.

Sections 4.1.1.1 and 4.1.2.1 have been revised to read, "To establish whether metals are elevated with respect to background in soils at the six facility properties, six soil samples will be collected from each facility (TD-FA-S-1 through -6 to -FF-S-1 through -6)."

Section 3.2, Bullet 3 states, "Determine the presence or absence of VOCs in soil gas and metals in soil on twelve properties identified as the most likely locations of hazardous substance sources to groundwater."

4 [General] The SAP notes that the Los Angeles County Department of Water and Power (DWP) will be sampling concurrently with EPA. However, based upon the October 9, 2008 conference call, the reviewer understands that DWP's participation is voluntary and may not occur. In addition, DWP's data will be used as a secondary data source by EPA. The plan should be revised to clarify the role of DWP and its data for this project.

Response:

Section 1.0, Bullet 2 and Section 1.3, Bullet 2 have been revised to state that "EPA Assumes that the DWP...."

5 [Section 1.1, Project Organization] This section states that the Weston project manager is also the "Field Sampling QC Coordinator." The project QA officer should

operate independently of those individuals responsible for project operations and implementation. How this independence will be achieved should be addressed in the SAP.

Response:

Dr. Paul Swift has been added as Weston's Data Quality Officer.

6 [Section 4.0, Sampling Rationale] The SAP states that borings will be located in the field based on historical information and/or field observations such as stained soils and distressed vegetation. Based on the inability to gain full access to all project sites and facilities at this point in time (site access agreements have not been negotiated) and the overall geographical dimensions of the project, the QA Office concurs with this approach. However, as expressed on the October 9, 2008 conference call, once in the field, the rationale for selecting individual boring locations should be noted in the field notebook, so that ultimately this information can be documented in the final report to EPA. The SAP should be revised to reflect that this additional level of effort will be undertaken to document sampling rationale once in the field. In addition, the SAP should state that the reason this approach is being undertaken is that site access agreements have not been negotiated to date.

Response:

Section 4.1.1 has been modified to read, "The EPA currently has not acquired site access to these facilities. Sampling at each of these facilities will be judgmental and based on information to be obtained during site walks and interviews that will occur once site access is granted. Sample location selection criteria will be entered into the field logbook and described in the final report."

In addition, a list of the six facilities in the South Operational Area is added. The methodology for determining the facilities to be investigated in the North Operational Area is described in Section 4.1.2.

If you have any questions about this SAP Comment Response, please feel free to contact this office.

Sincerely,

Weston Solutions, Inc.



Ben Castellana, Ph.D.
Project Manager

cc: Carl Brickner, USEPA
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